

Site Remediation Program Form (DRM-2)  
(To Be Submitted with all Plans and Reports)

144444

I. Site Identification:

Site Name: SAUGET AREA #1 SITES  
Street Address: VARIOUS IN CAHOKIA AND SAUGET  
City: SAUGET /CAHOKIA Illinois Inventory I. D. Number: SEE ATTACHED

II. Remediation Applicant:

Applicant's Name: M. A. PIERLE Company: MONSANTO COMPANY  
Street Address: 800 NORTH LINDBERGH BOULEVARD  
City: ST. LOUIS State: MO ZIP Code: 63167 Phone: 314-694-6370  
I hereby certify that the Illinois EPA has my permission to review and evaluate the attached project documents in accordance with the terms and conditions of the review and evaluation services agreement.  
Remediation Applicant's Signature: *Michael A. Pierle* Date: 3/31/97

II. Contact Person:

Name: MIKE LIGHT  
Company: MONSANTO COMPANY  
Street Address: 800 NORTH LINDBERGH BOULEVARD  
City: ST. LOUIS State: MO  
ZIP Code: 63167 Phone: 314-694-6370

III. Review & Evaluation Licensed Professional Engineer (opt.)

Name: N/A  
Company: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_  
ZIP Code: \_\_\_\_\_ Phone: \_\_\_\_\_

IV. Project Documents Being Submitted:

Indicate all that apply:  
 Phase I Environmental Assessment Report  
 Site Investigation Report - Comprehensive  
 Site Investigation Report - Focused  
 Remediation Objectives Report  
 Response Action Plan  
 Remedial Action Completion Report  
 Sampling Plan  
 Health & Safety Plan  
 Community Relations Plan  
 Risk Assessment  
 Contaminant Fate & Transport Modeling  
 Other -- Title: \_\_\_\_\_

V. Professional Engineer's Seal or Stamp:

I attest that all site investigations and remedial activities were performed under my direction and this document and all attachments were prepared under my direction or reviewed by me, and to the best of my knowledge and belief, the work described in the plan and report has been designed or completed in accordance with the Illinois Environmental Protection Act (415 ILCS 5), implementing regulations, and generally accepted engineering practices, and the information presented is accurate and complete.  
Engineer Name: Edward A. McBean  
Company: CRA Engineering Inc. Phone: 519-884-0510  
Signature: *Edward A. McBean*  
Professional Engineer's Seal or Stamp:  
Registration Number: 062-050693  
License Expiration Date: November 30, 1997

All information submitted is available to the public except when specifically designated by the Remediation Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines. The Illinois EPA is authorized to require this information under 415 ILCS 5/58 and regulations promulgated thereunder. Disclosure of this information is required. Failure to do so may prevent this form from being processed and could result in your application being rejected. This form has been approved by the Forms Management Center.

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L1630200005 - St Clair  
Sauget Sites (Area 1) - Sauget  
Superfund / Technical Reports  
E.1  
3/31/97

# Monsanto

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

March 31, 1997

Mr. Bill Child  
Chief, Bureau of Land  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

**RECEIVED**

MAR 31 1997

**IEPA/DLPC**

**Re: Sauget Sites Area I - Proposal for work under the Illinois voluntary Site Remediation Program**

Dear Mr. Child,

Please find enclosed a proposal representing Monsanto's commitment to undertake a comprehensive voluntary study of Sauget Area I under the Illinois Site Remediation Program (SRP). This commitment will require an estimated expenditure of \$2 Million to \$3 Million over a 2-year time frame. The objective of the proposed Work is to characterize the study area and to define and obtain approval for any required remedies. The proposal is in outline form and is intended to summarize for IEPA how Monsanto will undertake this exercise. However, we are prepared to discuss details at your convenience.

As a show of good faith, Monsanto is also prepared to begin ASAP, while details of the broader study are reviewed and approved, to collect additional data from Creek Sectors B, C, D and E. This priority data need was identified by IEPA in a November 11, 1996 meeting with Monsanto. An outline for this phase of the work is provided in Appendix A of the proposal.

Monsanto is well aware of and has formally responded to the June 1996 USEPA proposal to list Sauget Sites Area I on the NPL. Prior to IEPA/USEPA's initiation of the NPL listing proposal, Monsanto had begun following the development and recent approval of the Illinois Site Remediation Program as a procedural vehicle for voluntarily addressing the Sauget Sites. Monsanto believes that all stakeholders will benefit significantly by addressing Sauget Sites Area I under the SRP versus the alternative CERCLA process:

- The risk based, minimum bureaucracy SRP approach will in a more timely manner identify remedies for impacted areas that are both protective of human health and the environment and cost effective.

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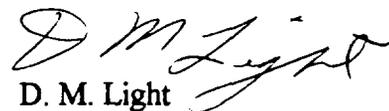
**SCREENED  
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- The Sauget and Cahokia communities will benefit from the potential for timely implementation of any needed corrective actions while avoiding the adverse social and economic consequences that have plagued numerous other communities across the country after having a site placed on the NPL.
- IEPA and USEPA will achieve its institutional objective of protection of human health and the environment in the shortest possible time and with minimum use of public funds. The SRP process will provide for maximum leverage of the private sector's contribution toward actual improvement of environmental conditions vs. inordinate expenditures on the more bureaucratic CERCLA process and installation of less cost effective ARARs and/or policy driven remedial actions.

Monsanto recognizes that this proposal does not give IEPA binding assurance that the final remedy will be implemented. It is also acknowledged that some pertinent questions such as access and orphan shares are not fully resolved for either party at this time. The proposal therefore represents a significant step of faith on Monsanto's part as well as an imperfect choice for IEPA. Nevertheless, the product of this \$2 million to \$3 Million study will have equal value to IEPA and USEPA whether the Site is completed under the SRP or CERCLA. It is significant that Monsanto is willing to make this proposal without qualifiers such as a stipulation that IEPA request USEPA to withdraw the NPL listing proposal. We recognize the sensitivity of such a request and are willing to move forward voluntarily, without assurance that the area will not later be placed on the NPL, in the belief that our performance under this proposal and the subsequent negotiations on allocation of the responsibility for remedial action costs will obviate any need for you to later revert to the CERCLA process.

In conclusion, Monsanto respectfully requests acceptance into the SRP for Sauget Sites Area I. Monsanto will work diligently and in good faith under the SRP with all stakeholders to thoroughly understand the study area, define needed corrective actions and reach equitable implementation agreements.

Sincerely,



D. M. Light  
Manager, Remedial Projects

Attachment

C:\P\Sauget\Sauget - SRP Proposal

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cc:

**IEPA**

Mary Gade  
Gary King  
Paul Takacs  
Terry Ayers  
Larry Eastep

**Monsanto Sauget Sites Team**

Mike Pierle  
Mike Foresman  
Keith Miller  
Steve Smith  
Kevin Cahill  
Bruce Yare  
Tom Bistline  
Brent Gilhousen

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Illinois Environmental Protection Agency  
Bureau of Land #24  
Remedial Project Management Section  
P.O. Box 19276  
Springfield, Illinois 62794-9276

FOR ILLINOIS EPA USE:  
LOG NO. \_\_\_\_\_  
 \$500 Advance Partial Payment Included  
 DRM-2 SRP Form Included  
 DRM-3 Request for Assessment Included

### Site Remediation Program Application and Service Agreement (DRM- 1)

#### I. Site Identification:

Site Name: SAUGET AREA #1 SITES  
Street Address : VARIOUS IN CAHOKIA AND SAUGET  
City: SAUGET/CAHOKIA ZIP Code: N/A  
County: ST. CLAIR Approximate Size of Site (Acres): UNKNOWN  
Illinois Inventory I. D. Number: SEE ATTACHED U.S. EPA I.D. Number :  
Site Base Map Attached? Yes:  No:  Legal Description Attached? Yes:  No:  Illinois EPA Permit(s):

#### II. Remediation Applicant:

Applicant's Name: M. A. PIERLE  
Title: VICE PRESIDENT  
Company: MONSANTO COMPANY  
Street Address: 800 NORTH LINDBERGH BOULEVARD  
City: ST. LOUIS State: MO ZIP Code: 63167  
Phone: 314-694-6370 FEIN or SSN:

I hereby certify that I am authorized to sign this application and service agreement. I certify that the proposed project meets the eligibility criteria set forth in Section 58.1(a)(2) of the Environmental Protection Act (415 ILCS 5/58.1(a)(2)) and regulations promulgated thereunder and that this submittal and all attachments were prepared at my direction. In consideration for the Illinois EPA's agreement to provide (subject to applicable law, available resources, and receipt of the advance partial payment) review and evaluation services for activities carried out pursuant to Title 17 of the Illinois Environmental Protection Act (415 ILCS 5/58-58.12), I agree to:

- (1) Conform with the procedures of Title 17 of the Illinois Environmental Protection Act (415 ILCS 5/58 - 58.12) and implementing regulations;
- (2) Allow for or otherwise arrange site visits or other site evaluation by the Illinois EPA when requested;
- (3) Agree to pay any reasonable costs incurred and documented by the Illinois EPA in providing such services; and
- (4) Make an advance partial payment to the Illinois EPA for such anticipated services provided in Section IV of this application.

As the Remediation Applicant, I understand that I may terminate this service agreement at any time, by notifying the Illinois EPA in writing that services previously requested under the service agreement are no longer wanted. Within 180 days after receipt of the notice, the Illinois EPA shall provide me with a final invoice for services provided until the date of receipt of such notification.

To the best of my knowledge and belief, this request and all attachments are true, accurate and complete. I hereby certify that I have the authority to enter into this agreement.

Remediation Applicant's Signature: Michael A. Pierle Date: 3/31/97

Owner's Name: VARIOUS PROPERTIES (SEE ATTACHED REPORT)

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_ Phone: \_\_\_\_\_

I hereby certify that the Remediation Applicant has my permission to enroll the site identified in Section I of this application into the Illinois EPA Site Remediation Program. I certify that the Remediation Applicant or designated representative has permission to enter upon the indicated premises to conduct remedial investigations or remediation.

Owner's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**IV. Advance Partial Payment:**

The Remediation Applicant shall identify which advance partial payment plan is selected:

Plan 1: A \$500 advance partial payment is included with this application. Please make the check payable to: "Treasurer, State of Illinois". Please include "Hazardous Waste Fund" and the Remediation Applicant's FEIN or SSN on the check; or

Plan 2: Request the Illinois EPA determine the appropriate partial payment (i.e., one-half of the total anticipated costs of the Illinois EPA or \$5,000, whichever sum is less). Information on Form DRM-3 ("Request for Assessment of Advance Partial Payment for Anticipated Services") must accompany this application in order for the Illinois EPA to determine the appropriate advance partial payment specific to the services requested.

NOTE: Statutory restrictions prevent the Illinois EPA from refunding payments. Payment under Plan 1 accelerates the review process but increases the risk of forfeiting the payment if the applicant is ineligible. Payment under Plan 2 may result in a larger advance partial payment when a final determination is made on the application.

**V. Project Objectives:**

Identify the anticipated scope of site investigations and remediation (e.g., cleanup of property for potential transfer or sale; resolution of liability for a release of a specific hazardous substance, petroleum or pesticide, etc.) and the nature of the release being sought from the Illinois EPA:

TO STUDY THE AREA 1 SAUGET SITES TO DETERMINE THE NEED FOR AND SCOPE OF POTENTIAL  
REMEDICATION NECESSARY TO OBTAIN A NO FURTHER REMEDIATION DETERMINATION

Anticipated Schedule through Completion Attached? Yes: X No: \_\_\_\_\_

If this application contains plans and reports for review and evaluation by the Illinois EPA, Form DRM-2 must also accompany this submittal.

The Illinois EPA is authorized to require this information under 415 ILCS 5/58 and regulations promulgated thereunder. Disclosure of this information is required. Failure to do so may prevent this form from being processed and could result in your application being rejected. This form has been approved by the Forms Management Center. All information submitted as part of this Application available to the public except when specifically designated by the Remediation Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

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**ATTACHMENT TO SITE REMEDIATION PROGRAM APPLICATION  
AND SERVICE AGREEMENT (DRM-1)**

**SAUGET AREA 1 SITES**

**EPA ID NUMBERS:** ~~Dead Creek Area G (Sauget I)~~ - ILD 981 953 623  
Waggoner Trucking Company - ILD 984 809 269  
H.H. Hall Excavation Pit - ILD 984 809 251  
H.H. Hall Construction Co. - ILD 982 973 603  
~~Dead Creek Segment A (Sauget I)~~ - ILD 984 809 277  
Dead Creek Segment B - ILD 980 792 006  
Dead Creek Segments C-F (Sauget I) - ILD 984 809 285  
Sauget Monsanto Illinois Landfills - ILD 980 614 176  
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